

FEDERAL ELECTION COMMISSION

May 3, 2012

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Scott Abrams
Campaign Manager
Sherman for Congress
4570 Van Nuys Blvd, #270
Sherman Oaks, CA 91403

OFFICE OF GENERAL COUNSEL

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR # 6570

Dear Counsel:

I write to file a complaint ("Complaint") against: 1) Congressman Howard Berman; 2) Congressman Berman's authorized campaign committee, Berman for Congress (FEC # C00147686); and 3) a pro-Berman Super PAC, the "Committee to Elect an Effective Valley Congressman" (FEC # C00507228) ("Berman-Super PAC") (collectively, "Respondents"). This Complaint, which alleges coordinated communications among Respondents in violation of 11 CFR 109.21, is squarely within the Federal Election Commission's ("FEC" or "Commission") jurisdiction. Accordingly, and for the reasons stated below, I respectfully request that the Commission investigate this matter and penalize Respondents for their blatant coordination.

Factual Background and Summary of Argument

This Complaint will lay out the most clearly documented case ever put before the FEC regarding coordination among a candidate, an authorized campaign committee, and a Super PAC. The chief conduit for this coordination is political consultant Jerry Seedborg, who, at all relevant times, has worked for and received payments from both Berman for Congress and the Berman Super PAC.

The most important requirement imposed upon Super PACs is that a candidate campaign committee and its consultant(s) cannot coordinate campaign strategy and message with a Super PAC and its consultant(s). Here, the consultant is the same person, Jerry Seedborg.

Berman for Congress and Congressman Berman have a longstanding relationship with political consultant Jerry Seedborg. This relationship goes back at least 30 years. On his websites¹, Mr. Seedborg prominently features words from fellow longtime political consultants for Berman for Congress—Congressman Berman's brother Michael and his partner, Carl D'Agostino: "Every time Berman and D'Agostino Campaigns has a campaign project we turn to Jerry Seedborg and his Voter Guide Slate Card for help. Jerry has been a trusted friend and talented consultant for 30+ years."² Michael Berman is not only the brother of Howard Berman, he is also a strategist for Berman for Congress. From 2000 to 2010, Berman for Congress paid Michael Berman over

¹ See <http://www.seedborgcampaigns.com/> and <http://www.voterguideslatecards.com/index.html>.

² *Id.*

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\$495,000, and Michael Berman was identified as the "campaign manager" for Berman for Congress in a *Los Angeles Times* article dated November 9, 2011.³

Berman for Congress has retained Mr. Seedborg and his company, Seedborg Campaigns, Inc. ("Seedborg Campaigns"), for consulting and other related services in connection with Congressman Berman's current race for California's 30th Congressional District. From January 1 to March 31, 2012, Berman for Congress paid a total of \$132,300⁴ to Seedborg Campaigns and Mr. Seedborg for consulting and other related services.⁵

Mr. Seedborg clearly knows the strategic assumptions behind Berman for Congress' campaign strategy and was paid over \$132,000 to develop campaign strategy. Mr. Seedborg then began advising and creating targeted mailings on behalf of the Berman Super PAC. From January 1 to March 31, 2012—the same period of time Mr. Seedborg and Seedborg Campaigns received \$132,300 from Berman for Congress—the Berman Super PAC incurred a \$23,595 debt to Mr. Seedborg's slate card company, Voter Guide Slate Cards ("VGSC"), for the drafting, design, targeting and production of pro-Berman slate cards to be mailed to certain voters within California's 30th Congressional District.⁶

For all intents and purposes, Mr. Seedborg and his two companies—Seedborg Campaigns and VGSC—are one and the same. Mr. Seedborg is the founder and principal of Seedborg Campaigns, and he describes himself on VGSC's website as the founder and principal of VGSC.⁷ Additionally, both companies are located at the same address (6285 E. Spring Street, Suite 202, Long Beach, CA 90808) and have the same phone number (562-425-5251).⁸ FEC regulations on coordination treat the owners, officers, and employees of a campaign vendor as a single unit.⁹

This unity between Seedborg Campaigns and VGSC exists not only in terms of ownership, physical location, and telephone number, but also with respect to both companies' reliance upon Mr. Seedborg's campaign expertise and experience. To this end, the VGSC website states:

Jerry [Seedborg] has been a keen observer and analyst of the history, trends, and evolving technology of elections and translates that knowledge into successful campaign strategies and competitive game plans. Seedborg Campaigns consulting firm and statewide Voter Guide Slate Cards combines [*sic*] time-tested

³ *New 'super PAC' forms to back Howard Berman*, Los Angeles Times, November 9, 2011.

⁴ In addition to this, Berman for Congress paid \$10,000 to Jerry Seedborg on December 27, 2011. See <http://query.nictusa.com/cgi-bin/dcdev/forms/C00147686/778569/sb/ALL>.

⁵ <http://query.nictusa.com/cgi-bin/dcdev/forms/C00147686/778135/sb/ALL>.

⁶ <http://query.nictusa.com/cgi-bin/dcdev/forms/C00507228/775133/sd/10>.

⁷ <http://www.voterguideslatecards.com/>.

⁸ See <http://www.voterguideslatecards.com/contact.html> and <http://www.seedborgcampaigns.com/>.

⁹ See 11 CFR 109.21(d)(4).

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strategies and tactics with state of the art methods and technology to bring successful results to his clients.¹⁰

Based upon the Berman Super PAC's first-quarter 2012 FEC filing declaring "slate mail" as the nature of the \$23,595 debt owed to VGSC, it is clear that this debt is for VGSC's drafting, design, targeting, production, and mailing of hundreds of thousands of pro-Berman slate cards. Invariably, all the strategies and tactical decisions in effectuating an effective slate mailer campaign are inextricably and materially affected by Mr. Seedborg's concurrent role as consultant to Berman for Congress and his intimate knowledge of Berman for Congress' campaign strategy and message. Examples of the strategic and tactical decisions needed to effectuate an effective slate mail campaign include:

- (1) **Content:** What slogans and endorsements to list on the card as reasons for voters to vote for Congressman Berman.
- (2) **Timing:** When to mail the slate cards so as to have the maximum effect given the timing of Berman for Congress mailers. Does Berman for Congress plan to target California's many vote-by-mail voters, who vote weeks before "election day"? When will Berman for Congress start its advertising so that the slate mailer is effective?
- (3) **Targeting:** Should slate cards be mailed only to Democrats, or is the Berman for Congress campaign sending material to Republicans, such that the slate mailer will "close the deal" and attract Republican votes as allowed in California's open primary? Should voters with a history of voting only occasionally be targeted, and how does this interfere with the expected mailing of the Berman for Congress campaign?

In light of Mr. Seedborg's and VGSC's roles as "common vendors" to both Berman for Congress and the Berman Super PAC, these pro-Berman slate cards constitute "coordinated communications" in violation of 11 CFR 109.21.

Legal Argument Setting Forth Respondents' Violations of 11 CFR 109.21

With all the publicity shined upon Super PACs during this election cycle, President Obama, his presumptive opponent Mitt Romney, and two would-be Republican Presidential nominees—Newt Gingrich and Rick Santorum—have all stressed that no one involved in their campaigns has had any contact with those making messaging and expenditure decisions at a Super PAC.

Unlike these Presidential candidates and their respective authorized campaign committees and Super PACs, Respondents have ignored this fundamental law, embodied in 11 CFR 109.21, prohibiting coordinated communications. As discussed in further detail below, Respondents violated 11 CFR 109.21's anti-coordination provisions when the Berman Super PAC retained Berman for Congress' consultant Jerry Seedborg and Mr. Seedborg's company, VGSC, to create

¹⁰ <http://www.voterguideslatecards.com/about.html>.

and mass disseminate public communications in the form of slate cards advocating for the re-election of Congressman Howard Berman.

Respondents' actions, as described herein, convincingly meet the three-prong test for "coordinated communication," as set forth by 11 CFR 109.21.

Prong #1: Slate Cards for Berman for Congress were Paid for by a Super PAC

The first prong is clearly satisfied because the relevant communications (i.e., pro-Berman slate cards) have been "paid for, in whole or in part, by a person other than that candidate, authorized committee, or political party committee."¹¹

Here, the Berman Super PAC—an entity that is supposed to be separate from Congressman Berman and Berman for Congress—incurred a \$23,595 debt to VGSC for the drafting, design, targeting, production, and dissemination of pro-Berman slate cards. It is clear that this debt was incurred for VGSC's work on slate cards because in its FEC filing for the \$23,595 debt, the Berman Super PAC lists "slate mail" under "Nature of Debt."¹² VGSC stands for "Voter Guide Slate Cards," and creating and effectuating slate card mail campaigns is its primary business.

Prong #2: The Slate Cards Expressly Advocate for Congressman Berman's Candidacy for Federal Office

The second prong is satisfied here because mass-disseminated slate cards urging 30th District voters to re-elect Congressman Howard Berman are inherently "public communication[s]"¹³ that expressly [advocate]...the election...of a clearly identified candidate for Federal office."¹⁴

Prong #3: Jerry Seedborg and VGSC are Common Vendors for Both Berman for Congress and a Super PAC

11 CFR 109.21(d)(4), the third prong, consists of three component parts that determine whether a "commercial vendor" is a "common vendor" for, on the one hand, a candidate and/or his/her campaign, and on the other hand, a Super PAC.

Here, all three components of Prong #3 are satisfied because: a) Jerry Seedborg and VGSC are "commercial vendors," as defined in 11 CFR 116.1(c); b) At the same time they have been retained by the Berman Super PAC to create, produce, target, and/or distribute pro-Berman slate cards, both VGSC (through owner and officer Mr. Seedborg) and Mr. Seedborg have provided

¹¹ 11 CFR 109.21(a)(1)

¹² *Supra* note 6.

¹³ Slate cards are a type of "mass mailing" and are therefore considered "public communication" under 11 CFR 100.26.

¹⁴ 11 CFR 109.21(c)(3)

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political consulting and other services to Berman for Congress and Congressman Berman; and c) Mr. Seedborg and VGSC used and/or conveyed to the Berman Super PAC "information about the campaign plans, projects, activities, or needs"¹⁵ of Congressman Berman and his campaign, and moreover, "that information is material to the creation, production, or distribution"¹⁶ of the pro-Berman slate cards.

Prong #3, Part (a): The Berman Super PAC Retained the Services of "Commercial Vendors" Jerry Seedborg and VGSC to Create, Produce and/or Distribute Pro-Berman Slate Cards

The first part of Prong #3 requires a complainant show that an entity, other than the candidate or his/her campaign, retained a "commercial vendor" to create, produce, or distribute a communication.¹⁷ "Commercial vendor" is defined by 11 CFR 116.1(c) as "any persons providing goods or services to a candidate or political committee whose usual and normal business involves the sale, rental, lease or provision of those goods or services."

Here, it is clear that the Berman Super PAC retained commercial vendors for the creation, production, and distribution of slate cards. Both Jerry Seedborg and VGSC are commercial vendors because both are in the usual and normal business of producing goods in the form of slate cards and providing services related to the design and distribution of these slate cards.¹⁸

Accordingly, this factor is satisfied because the Berman Super PAC—an entity (supposedly) separate from Congressman Berman and Berman for Congress—retained commercial vendors Mr. Seedborg and VGSC at a cost of \$23,595 to create, produce, and distribute pro-Berman slate cards.

Prong #3, Part (b): Jerry Seedborg, both Individually and through His Companies Seedborg Campaigns and VGSC, Concurrently Provided Services to All Respondents—the Berman Super PAC, Berman for Congress, and Congressman Berman

The second part of Prong #3, 11 CFR 109.21(d)(4)(ii), requires a complainant show that a Super PAC's commercial vendor (including any owner, officer, or employee thereof) has provided consulting services (or any other service enumerated at 11 CFR 109.21(d)(4)(ii)(A)-(I)) to a candidate or his campaign within 120 days of being retained by the Super PAC.

Here, this requirement is satisfied because, from at least January 1 to March 31, 2012, Jerry Seedborg and VGSC (through officer and owner Jerry Seedborg) provided consulting and other

¹⁵ 11 CFR 109.21(d)(4)(iii)(A).

¹⁶ *Id.*

¹⁷ 11 CFR 109.21(d)(4)(i)

¹⁸ *See supra* note 7.

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services listed at 11 CFR 109.21(d)(4)(ii)(A)-(I) to Congressman Berman and Berman for Congress while concurrently providing products and services to the Berman Super PAC.

In response to accusations of such clear coordination involving Jerry Seedborg, Berman for Congress senior advisor Brandon Hall was quoted on April 20, 2012 by the *Los Angeles Times* as saying, "Jerry Seedborg and [Berman for Congress] parted ways almost two months ago."¹⁹ This is simply untrue, and even if true, would not exculpate Respondents here.

Berman for Congress' FEC filing for January 1 to March 31, 2012 shows that Berman for Congress paid \$132,300 for services rendered by Seedborg Campaigns and Mr. Seedborg, with the most recent payment of \$50,000 on March 20, 2012.²⁰ And the Berman Super PAC's FEC filing for the same period shows a \$23,595 debt to Mr. Seedborg's company, VGSC, for "slate mail"²¹ and that debt was incurred before March 31, 2012.

Accordingly, since Mr. Seedborg, both individually and through his companies, provided consulting and other services to Congressman Berman and Berman for Congress while concurrently—let alone within 120 days of—being retained by the Berman Super PAC for "slate mail," this factor is demonstrably satisfied.

Complainant need not show that Jerry Seedborg was receiving inside information or providing strategic advice to Berman for Congress on the exact day he was strategizing and designing a slate mailer program for the Berman Super PAC. FEC regulations (e.g., 11 CFR 109.21(d)(4)) provide a 120-day rule. Coordination exists when a common vendor (including any owner or officer thereof—in this case, Jerry Seedborg and VGSC) has provided any of the following services to the "authorized campaign committee" (Berman for Congress) "during the previous 120 days: ... Developing the content of a public communication; producing a public communication; ... developing voter lists or mailing list" (such as selecting which voters are to receive a particular slate card).

Prong #3, Part (c). The Berman Super PAC Retained Jerry Seedborg and VGSC to Use and/or Convey Berman for Congress' Campaign Strategy, Message, and Other Non-Public Campaign Information in Creating, Producing, and/or Distributing Pro-Berman Slate Cards

The final part of Prong #3, 11 CFR 109.21(d)(4)(iii), is satisfied if a complainant demonstrates that the "commercial vendor uses or conveys... information about the campaign plans, projects, activities, or needs of the clearly identified candidate... and that information is material to the creation, production, or distribution of the communication."²²

¹⁹ http://latimesblogs.latimes.com/california-politics/2012/04/sherman-campaign-questions-super-pac-role.html?utm_source=twitterfeed&utm_medium=twitter.

²⁰ *Supra* note 5.

²¹ *Supra* note 6.

²² *Supra* note 15.

Prong #3's final part is clearly satisfied here. As owner and officer of VGSC, Jerry Seedborg is paid by the Berman Super PAC to strategize, design, target, and produce hundreds of thousands of slate cards touting Congressman Berman. Mr. Seedborg will decide what parts of Congressman Berman's record and which of his endorsements to feature on these slate cards. Mr. Seedborg will also decide to which voters to mail the slate cards and when to do so—all material strategic decisions in a mail-driven campaign.

And supposedly, Mr. Seedborg will do all this without knowing what advice he has personally given Berman for Congress—advice for which he and Seedborg Campaigns have received over \$132,000. Such a scenario is possible only if Mr. Seedborg's mind was cleared of all knowledge of the Berman for Congress campaign plan, which was possible only in the movie *Total Recall*.

While a consultant for Berman for Congress, Mr. Seedborg undoubtedly has been exposed to and has strategized about "campaign plans, projects, activities, or needs."²³ After all, hefty payments to Mr. Seedborg and Seedborg Campaigns totaling \$132,300 over only a three-month period clearly were not for *de minimis* functions, but rather could only be for Mr. Seedborg's strategy, advice, and handling of other sensitive campaign matters (e.g., campaign message).

With non-public, insider information in tow, Mr. Seedborg has been concurrently retained by the Berman Super PAC to create, produce, and/or distribute pro-Berman slate cards. As previously asserted herein, the content (e.g., particular slogans, endorsements) on these pro-Berman slate cards, the recipients of these slate cards, and the timing of the mailings are inextricably and materially affected by Mr. Seedborg's concurrent role as consultant to Berman for Congress and his intimate knowledge of Berman for Congress' campaign strategy and message.²⁴

Accordingly, this factor and the previous two factors comprising Prong #3 are satisfied. As Prongs #1 and #2 are also satisfied, this Complaint has demonstrated that Respondents have violated 11 CFR 109.21's bar on coordinated communications.

Conclusion

In light of this crystal clear case of coordinated communications, I respectfully request that the Commission investigate this matter and penalize Respondents for their wanton violations of federal election law.

²³ *Id.*

²⁴ The "substantial discussion" variant of this prong would also be satisfied here because Mr. Seedborg, as agent of both Berman for Congress and the Berman Super PAC, inevitably has had conversations with Congressman Berman and/or Berman for Congress regarding the campaign's "plans, projects, activities, or needs, and that information is material to the creation, production, or distribution" of the pro-Berman slate cards. See 11 CFR 109.21(d)(3) ("substantial discussion" conduct prong); see also 11 CFR 109.3 (definition of "agent").

Office of General Counsel
Federal Election Commission
May 2, 2012
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Respectfully,


Scott Abrams

~~Sworn to and subscribed before me this _____ day of _____ 2011.~~

~~Notary Public in and for the State of California, County of Los Angeles.~~

~~My commission expires: _____~~

SEE
ATTACHMENT

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CALIFORNIA JURAT WITH AFFIANT STATEMENT

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-5 to be completed only by document signer[s], *not* Notary)

1 _____

2 _____

3 _____

4 _____

5 _____

6 _____

Signature of Document Signer No. 1 Signature of Document Signer No. 2 (if any)

State of California.
 County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this

3 day of May, 2012, by

Date Month Year

(1) SCOTT ABRAMS

Name of Signer

proved to me on the basis of satisfactory evidence to be the person who appeared before me (.) AT

(and

(2) _____

Name of Signer

proved to me on the basis of satisfactory evidence to be the person who appeared before me.)

Signature _____

Signature of Notary Public



Place Notary Seal Above

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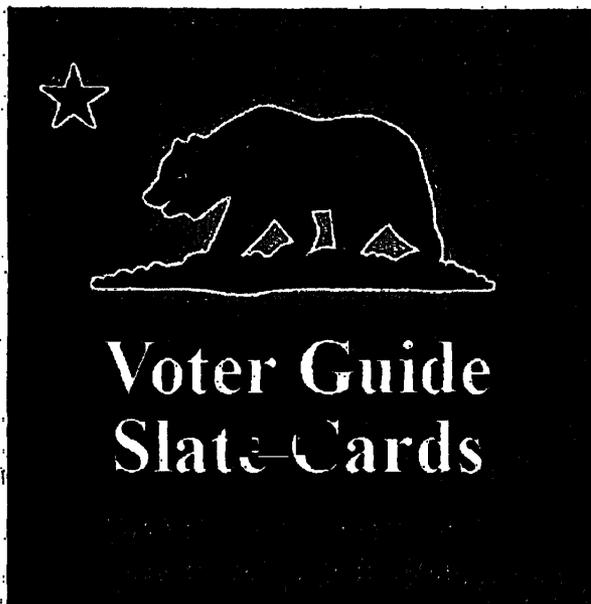
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[Under Construction]

"Every time Berman and D'Agostino Campaigns has a campaign project we turn to Jerry Seedborg and his Voter Guide Slate Card for help. Jerry has been a trusted friend and talented consultant for 30+ years." *Carl D'Agostino & Michael Berman*

**Contact Information:
Seedborg Campaigns
6285 E. Spring Street, Suite 202
Long Beach, CA 90808
(562) 425-5251**

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We are now taking reservations for the June 2012 Open Primary Election and November 2012 General Elections. The following guides will be published:

- Democratic Voter Guide
 - Republican Voter Guide
 - Independent Voter Guide
- (for mixed party households and decline to state voters)

With the new Open Primary rules, slate cards will have even more influence as voters make up their minds. We cover nonpartisan and partisan Federal and state legislative districts, statewide offices, judges, municipal offices, and school and special districts as well as statewide and local ballot measures. Contact us at (562) 426-5251 or by email for household counts and cost for your race.

For 25 years, Voter Guide Slate Cards (VGSC) has been influencing elections through its direct mail program. We are the most experienced slate mail program in California and have pioneered many features now commonplace on political slate mailers. [Read More]

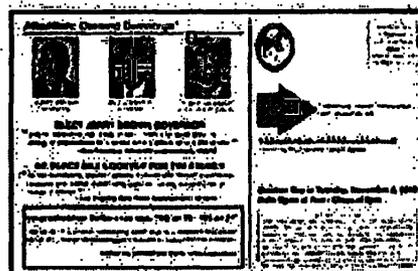
Each major election cycle, VGSC distributes slate cards to millions of households in California and counts amongst its paying clients over 4,000 candidates and ballot measures. We mail on time and in the quantities promised in order to serve both vote-by-mail voters and election day voters. [Read More]

Slate cards are a cost-effective and prudent expenditure for limited fundraising dollars, because candidates and ballot measures only pay a fraction of the total cost to produce and mail the guides. VGSC has proven to be tremendously influential in local races in which advertising dollars are limited and voter participation can be 50% less than better known top-of-the-ticket offices. [Read More]

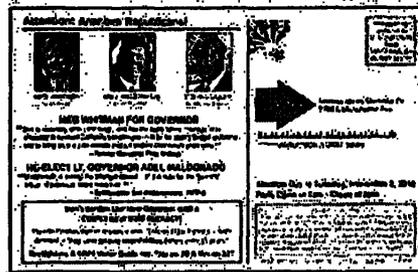
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"Every time Berman and D'Agostino Campaigns has a campaign project we turn to Jerry Seedborg and his Voter Guide Slate Card for help. Jerry has been a trusted friend and talented consultant for 30+ years." *Carl D'Agostino & Michael Berman*

"Picking through the results of California's historically low-turnout election last week, one conclusion jumps out – candidates and



Voters statewide recognize our familiar graphic design used for 25 years.



An average of 300-plus candidates participate on our slates each election, and we provide a complete listing of all candidates in official ballot order. [Samples]

measures that put their money into
slate cards made a good
investment..." said Tony Quinn,
co-editor of California Target Book
and one of the most
knowledgeable analysts of politics
in the state.

California WatchBlog
June 21, 2010

Founder and Principal, Jerry Seedborg, draws upon over forty years of experience at every level of politics and government. Campaign consulting and management services, offered through Seedborg Campaigns, have been decisive in electing candidates in California's most competitive elections. Together with Voter Guide: Slate Cards, Seedborg and team combine time-tested strategies, state of the art methods and proprietary voter targeting software to bring successful results to our clients. [Read More]

© 2012 : Voter Guide Slate Cards : (562) 425-5251 or Contact Us by Email

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latimes.com/news/politics/la-pn-berman-superpac-20111109,0,6080038.story

latimes.com

New 'super PAC' forms to back Howard Berman

By Tom Hamburger and Melanie Mason

Washington Bureau

1:41 PM PST, November 9, 2011

A new "super PAC" emerged this month to back the candidacy of Rep. Howard Berman, the advertisement California Democrat who faces a tough reelection battle in part because he must compete with a neighboring San Fernando Valley Democrat, Rep. Brad Sherman, for a newly redrawn congressional seat.

The new super PAC, set up through a California law firm, may be yet another sign of the wave of money that will hit not only Berman's race, but others as well.

Details of the new super PAC, called the Valley-Israel Alliance, were hard to come by but its very existence, on top of a handful of others, may signal new power for these "super" groups -- that can accept unlimited donations from individuals, corporations and unions. They have emerged already to back nearly every major presidential candidate. Now they are emerging in congressional contests, and reform advocates are sounding apoplectic.

A lawyer for the new group said it represents a coalition of U.S. and pro-Israel interests acting "independently supporting Howard Berman's reelection." The lawyer, Brad Hertz of the Sutton Law Group, declined to provide further details on the group's backers or its fundraising plans. His colleague, Jesse Mainardi, serves as treasurer of the group and signed the filings submitted to the Federal Election Commission last week.

"Our campaign does not know Jesse Mainardi, nor do we know his activities or intentions, and Congressman Berman is certainly not planning on attending any events or fund-raisers hosted by his organization," said the congressman's campaign manager, Michael Berman.

The FEC registration this month represents formation of one of the first super PACs for a specific House candidate. At least one has been registered on behalf of a Senate incumbent, Utah Republican Sen. Orrin Hatch. And several have been set up to promote groups of candidates, such as one benefiting the so-called Young Guns, the nickname for conservative freshmen Republicans.

Under terms of the Supreme Court's Citizens United decision and subsequent interpretations by the Federal Election Commission, these new super PACs must be technically independent of candidates and their official campaigns. This year has seen establishment of super PACs connected to presidential candidates. Many are run by former political aides to the candidates.

The emergence of these big-dollar campaign advocacy committees is distressing to reformers, who say it

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opens the way for a return to unbridled influence of big money interests.

"It is the most dangerous vehicle for corruption in our political system today," said Fred Wertheimer who led the effort to enact campaign reforms after the Watergate scandal of the 1970s. "The candidate-specific super PAC exists to eviscerate the limits on contributions to candidates that were enacted to prevent corruption."

tom.hamburger@latimes.com

melanie.mason@latimes.com

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**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 307 OF 342	
	<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Berman for Congress

Full Name (Last, First, Middle Initial) A. San Fernando Florist		Date of Disbursement 11 / 16 / 2011
Mailing Address 237 N. MacLay Ave.		Amount of Each Disbursement this Period 6427.13 Transaction ID: 17-11728
City San Fernando	State CA	
Zip Code 91340	Purpose of Disbursement Event Costs	Category/ Type 003
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	
Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	State: District:	

Full Name (Last, First, Middle Initial) B. Seaside Political Printing & Direct Mail		Date of Disbursement 11 / 15 / 2011
Mailing Address 1220 East 4th St.		Amount of Each Disbursement this Period 8835.94 Transaction ID: 17-11724
City Long Beach	State CA	
Zip Code 90802	Purpose of Disbursement Printing	Category/ Type 003
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	
Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	State: District:	

Full Name (Last, First, Middle Initial) c. Jerry Seedborg		Date of Disbursement 12 / 27 / 2011
Mailing Address 1244 19th St., NW		Amount of Each Disbursement this Period 10000.00 Transaction ID: 17-11943
City Washington	State DC	
Zip Code 20036	Purpose of Disbursement Administrative Services	Category/ Type 001
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	
Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	State: District:	

SUBTOTAL of Disbursements This Page (optional)	25263.07
TOTAL This Period (last page this line number only)	

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**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)			
	<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Berman for Congress

Full Name (Last, First, Middle Initial) A. Secretary of State		Date of Disbursement MM / DD / YYYY 02 / 09 / 2012
Mailing Address PO Box 1467		Amount of Each Disbursement this Period 1706.36
City: Sacramento	State: CA Zip Code: 95812-1467	
Purpose of Disbursement Candidate Filing Fee		Transaction ID : 17-12512
Candidate Name		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Category/Type 001
State: District:		

Full Name (Last, First, Middle Initial) B. Secretary of State		Date of Disbursement MM / DD / YYYY 02 / 14 / 2012
Mailing Address PO Box 1467		Amount of Each Disbursement this Period 8900.00
City: Sacramento	State: CA Zip Code: 95812-1467	
Purpose of Disbursement Candidate Ballot Stmt Fee		Transaction ID : 17-12534
Candidate Name		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Category/Type 001
State: District:		

Full Name (Last, First, Middle Initial) C. Seedborg Campaigns, Inc.		Date of Disbursement MM / DD / YYYY 03 / 01 / 2012
Mailing Address 6285 E. Spring St., #202		Amount of Each Disbursement this Period 28300.00
City: Long Beach	State: CA Zip Code: 90808	
Purpose of Disbursement Administrative Services		Transaction ID : 17-12629
Candidate Name		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Category/Type 001
State: District:		

SUBTOTAL of Disbursements This Page (optional)	36906.36
TOTAL This Period (last page this line number only)	

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**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21
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NAME OF COMMITTEE (In Full)
Berman for Congress

Full Name (Last, First, Middle Initial)

A. Seedborg Campaigns, Inc.

Mailing Address 6285 E. Spring St., #202

City Long Beach State CA Zip Code 90808

Purpose of Disbursement
Administrative Services

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)
State: District:

Date of Disbursement

03 20 2012

Amount of Each Disbursement this Period

50000.00

Transaction ID: 17-12678

Full Name (Last, First, Middle Initial)

B. Jerry Seedborg

Mailing Address 1244 19th St., NW

City Washington State DC Zip Code 20036

Purpose of Disbursement
Administrative Services

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)
State: District:

Date of Disbursement

01 03 2012

Amount of Each Disbursement this Period

13000.00

Transaction ID: 17-11944

Full Name (Last, First, Middle Initial)

C. Jerry Seedborg

Mailing Address 1244 19th St., NW

City Washington State DC Zip Code 20036

Purpose of Disbursement
Administrative Services

Candidate Name

Office Sought: House Senate President
Disbursement For: Primary General Other (specify)
State: District:

Date of Disbursement

01 09 2012

Amount of Each Disbursement this Period

15000.00

Transaction ID: 17-11945

SUBTOTAL of Disbursements This Page (optional)

78000.00

TOTAL This Period (last page this line number only)

12044323038

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)				PAGE 256 OF 303
	<input checked="" type="checkbox"/> 17 20a	<input type="checkbox"/> 18 20b	<input type="checkbox"/> 19a 20c	<input type="checkbox"/> 19b 21	

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NAME OF COMMITTEE (In Full)
Berman for Congress

A. Jerry Seedborg

Full Name (Last, First, Middle Initial)

Mailing Address 1244 19th St., NW

City Washington State DC Zip Code 20036

Purpose of Disbursement: Administrative Services

Candidate Name

Office Sought: House Senate President

Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement: 02 / 01 / 2012

Amount of Each Disbursement this Period: 13000.00

Transaction ID: 17-13650

Category/Type: 001

B. Jerry Seedborg

Full Name (Last, First, Middle Initial)

Mailing Address 1244 19th St., NW

City Washington State DC Zip Code 20036

Purpose of Disbursement: Administrative Services

Candidate Name

Office Sought: House Senate President

Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement: 02 / 08 / 2012

Amount of Each Disbursement this Period: 5000.00

Transaction ID: 17-13656

Category/Type: 001

C. Jerry Seedborg

Full Name (Last, First, Middle Initial)

Mailing Address 1244 19th St., NW

City Washington State DC Zip Code 20036

Purpose of Disbursement: Administrative Services

Candidate Name

Office Sought: House Senate President

Disbursement For: Primary General Other (specify)

State: District:

Date of Disbursement: 02 / 17 / 2012

Amount of Each Disbursement this Period: 10000.00

Transaction ID: 17-12554

Category/Type: 001

SUBTOTAL of Disbursements This Page (optional)..... 28000.00

TOTAL This Period (last page this line number only).....

12044323039

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
 Excluding Loans

NAME OF COMMITTEE (In Full)
 Committee to Elect an Effective Valley Congressman

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor Strumwasser & Woocher LLP	Nature of Debt (Purpose): Professional Legal Services
Mailing Address: 10940 Wilshire Boulevard Suite 2000	
City: Los Angeles State: CA Zip Code: 90024	

Outstanding Balance Beginning This Period 0.00	Transaction ID : SD10.4312
Amount Incurred This Period 10565.08	Outstanding Balance at Close of This Period 10565.08
Payment This Period 0.00	

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor Voter Guide Slate Cards	Nature of Debt (Purpose): Slate mail
Mailing Address: 6285 E. Spring Street Suite 202	
City: Long Beach State: CA Zip Code: 90808	

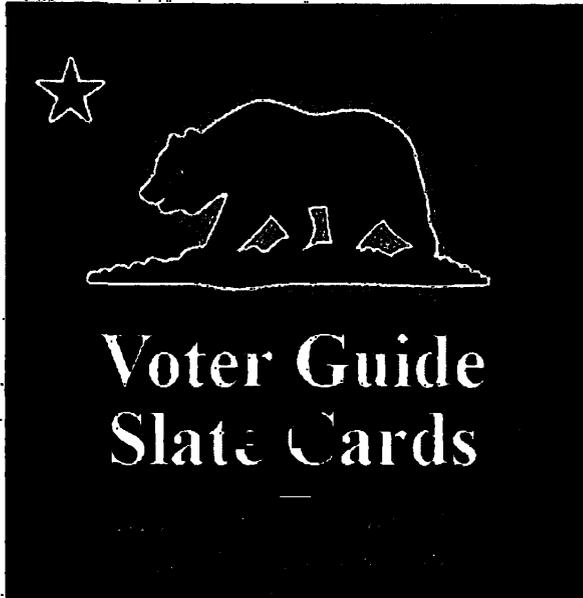
Outstanding Balance Beginning This Period 0.00	Transaction ID : SD10.4271
Amount Incurred This Period 23595.00	Outstanding Balance at Close of This Period 23595.00
Payment This Period 0.00	

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor	Nature of Debt (Purpose):
Mailing Address	
City State Zip Code	

Outstanding Balance Beginning This Period	Payment This Period	Outstanding Balance at Close of This Period
Amount Incurred This Period		

1) SUBTOTALS This Period This Page (optional)	34160.08
2) TOTALS This Period (last page this line number only)	77312.08
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	0.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	77312.08

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About Us

Jerry Seedborg – Founder / Principal / Sales

Jerry Seedborg is one of California's leading political strategists and campaign experts. With over forty years of experience at every level of politics and government – grassroots organizing, electoral campaigns and legislative politics – he has the background to understand and appreciate the unique nature of California elections. Jerry has been a keen observer and analyst of the history, trends, and evolving technology of elections and translates that knowledge into successful campaign strategies and competitive game plans. Seedborg Campaigns consulting firm and statewide Voter Guide Slate Cards combines time-tested strategies and tactics with state of the art methods and technology to bring successful results to his clients.

Jerry's political involvement began with community organizing in the late 1960s. By the 1970s, he had become a leading political strategist in hard fought legislative and local elections in Southern California. He later served as chief of staff to several legislators and the State Controller in Sacramento. While in the state capital, Jerry also worked as a consultant to the California Legislature with expertise in offshore oil drilling, election law, political reform and the voter initiative process, education reform, and the 1990 and 2000 census counts within the State.

Jerry's campaign management services have been decisive in electing candidates in California's most competitive elections for city councils, judicial offices and school boards as well as the State Legislature and U.S. Congress. He has run campaigns for some of California's most influential political leaders, and been recognized for organizing the most innovative Get Out the Vote effort in State Senate election history.

In 1984, Jerry was part of the first computer generated political slate mail campaign enterprise in California history. Jerry began his own slate mail program in 1986 and has played a pivotal role in many underdog campaigns for over 20 years. Voter Guide Slate Cards utilizes the most sophisticated proprietary software programs to target voters above and beyond any other slate operating in California.

Jolie McKay – Production / Marketing / Research

Jolie McKay, born with politics in her blood, started working on political campaigns before she could even vote. Under the direction of CCS Jerry Seedborg, Jolie cut her teeth as a team member of the esteemed state legislator Gary K. Hart in Santa Barbara. Thirty years later, she has rejoined Jerry to offer her considerable talents of administration, finance and project management to Voter Guide State Cards and Seedborg Campaigns.

In the interim, Jolie received an undergraduate degree in political science from UC Santa Barbara and a Masters in City and

Regional Planning from UC Berkeley. She spent many years as an environmental resource management specialist including at the League of Women Voters, the Environmental Law Institute, and the California Coastal Commission. Her career has encompassed many other disciplines from nonprofit creation, fundraising and event planning to co-founding a design and woodworking business. She has come full circle back to the political arena.

Reach the Voter Guide Team at:

Voter Guide Slate Cards
6285 E. Spring Street, Suite 202
Long Beach, CA 90808
(562) 425-5251
Contact Us by Email.

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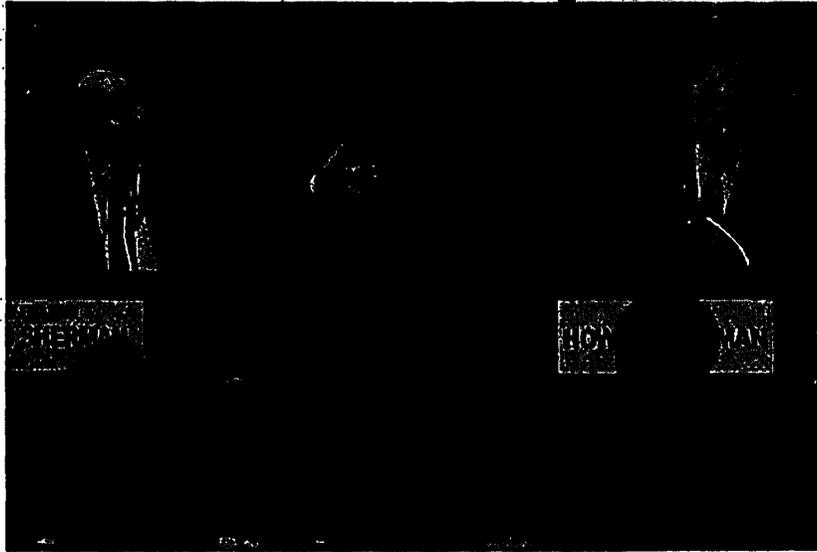
Los Angeles Times LOCAL

PolitiCal

ON POLITICS IN THE GOLDEN STATE

Brad Sherman campaign questions 'super PAC' role

April 20, 2012 | 2:26 pm



Rep. Brad Sherman's political consultant thought he smelled a rat when he uncovered what he considered evidence of some possible — and illegal — collusion between rival Howard Berman's campaign and one of the "super PACs" that have formed to support Berman in the costly clash between the two Democratic congressmen for a single San Fernando Valley district seat.

Combing through the most recent campaign finance records filed with the Federal Election Commission, Sherman chief consultant Parke Skelton noticed that the Berman campaign had made payments to the same consultant used by the super PAC Committee to Elect an Effective Valley Congressman, one of at least two such organizations favoring Berman. Super PACs may collect and spend unlimited amounts to oppose or help elect candidates so long as their efforts are "independent" and they do not coordinate with the candidate's campaign.

Skelton found the Berman for Congress Campaign had paid consultant Jerry Seeborg \$132,000 while the super PAC incurred a debt of \$23,595 to Seeborg's company, Voter Guide Slate Cards.

"If my worst suspicions are true," Skelton said in a news release Friday, "then what we're seeing is an outrageous example of the destructive role of super PACs in our democracy. I am deeply concerned that this is evidence the Berman campaign is coordinating with a super PAC — and that would be clearly illegal."

Not so, said Brandon Hall, a senior advisor for the Berman campaign.

"Jerry Seeborg and the campaign parted ways almost two months ago," said Hall, who would not publicly disclose the reason for the parting. "We have no control over the actions of any independent expenditure efforts, as we are not allowed to coordinate with them."

Sherman made super PACs an issue early in the campaign by repeatedly, and unsuccessfully, challenging Berman to sign a pledge aimed at blunting their influence in the race, which is on its way to possibly setting a record for spending in a House election.

Sherman had more success with another of his challenges in the increasingly contentious contest. He released copies of his 2011 federal income tax returns earlier this week and urged Berman to do the same.

On Friday, Hall said Berman would release his returns soon. And he added that Berman was looking "forward to getting back to the real issues in this campaign," including the two congressmen's sparring over who can rightly take credit for expansion of the 405 Freeway.

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--Jean Merl

Photo: Reps. Brad Sherman, left, and Howard Berman at a candidates forum earlier this year. Credit: Genaro Molina/Los Angeles Times

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